

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

IN RE:

**PRIME RENTALS, LLC,**

Debtor.

**Case No. 15-\_\_\_\_-\_\_\_\_-11**

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**APPLICATION TO EMPLOY ATTORNEYS**

Prime Rentals, LLC, ("Debtor"), by its duly authorized officer, respectfully represents the following to the Court:

1. Prime Rentals, LLC, is the Debtor in the captioned Bankruptcy proceeding, which was commenced by the filing of a Voluntary Petition under Chapter 11 of the Bankruptcy Code on September 2, 2015.

2. Your applicant is desirous of employing KC Cohen, Lawyer, PC, 151 N. Delaware St., Ste. 1106, Indianapolis, Indiana 46204-2573, attorneys duly admitted to practice in this Court, as its counsel, ("Counsel"). Prior to filing this case the Debtor and Counsel entered into an Engagement Agreement that defines certain terms and conditions for the provision of professional services by Counsel to Debtor. To the extent this Application, or any Order entered by the Court on it alters, amends or adds to such terms, they are deemed to be incorporated into the Engagement Agreement. The Engagement Agreement calls for the Debtor to pay counsel, subject to appropriate approval of fees or allowance of draws by the Court, on an hourly basis at the rate of \$300 per hour.

3. Your applicant has selected said attorney for the reason that he has had extensive experience in matters of this character and your applicant believes that he is well qualified to represent its interest in this proceeding.

4. The professional services of said counsel that are to be rendered are as follows:

a) To give your applicant advice with respect to its duties, powers and responsibilities in this case;

b) To investigate and pursue any actions on behalf of the estate in order to recover assets for or best enable this estate to reorganize fairly.

c) To represent the Debtor in these proceedings in an effort to maximize the value of the assets available herein, and to pursue confirmation of a successful Plan of Reorganization.

d) To perform such other legal services as may be required and in the interest of the estate herein.

5. To the best of your applicant's knowledge, and except as set forth in the Affidavit of Counsel attached hereto as Exhibit "A", said attorneys represent no other entity in connection with this case, are disinterested persons, and represent or hold no interest adverse to the matters upon which they are to be employed.

6. Counsel received the payments identified in the answer to question 9 in the Statement of Financial Affairs, in the amount of \$6,717.00. Immediately prior to filing this case Counsel transferred the amount of \$ [REDACTED] from his trust account in full satisfaction of a pre-petition invoice that represents services rendered by Counsel to prepare and file it. The balance of \$ [REDACTED] ("Trust Balance") remains in Counsel's trust account. Debtor and Counsel would request authority for Counsel to retain the Trust Balance and to seek interim payment of fees and expense under the draw procedure outlined in local rule SD Ind B-2014 (b)(3) and (4) of this Court, either as a trust balance or to be augmented by funds transferred by the Debtor to Counsel from post-petition assets.

**WHEREFORE**, the Debtor herein respectfully requests that it be authorized to employ said attorney under such terms as may be authorized by the Court to represent it in this proceeding, and for all other just and proper relief under the premises.

Respectfully Submitted,

Prime Rentals, LLC

/s/ Brenda Hatfield  
By: Brenda Hatfield, its managing member

Attorneys for the Debtor:  
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**CERTIFICATE OF SERVICE**

The undersigned counsel, hereby certifies that a copy of the foregoing was served upon the below listed parties at the address indicated using the Court's ECF filing system. In addition, copies of the foregoing were delivered to the following parties in interest by the means shown on September 2, 2015:

KC Cohen on behalf of Debtor Prime Rentals, LLC  
kc@esoft-legal.com

Brenda Hatfield  
hatfield.brenda@gmail.com

U.S. Trustee  
ustpreion10.in.ecf@usdoj.gov

\_\_\_\_\_/s/ KC Cohen\_\_\_\_\_  
KC Cohen 04310-49